

July 2, 2025

**By ECF**

Hon. Andrew L. Carter Jr.  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: SEC v. Zhabilov, et al., No. 1:24-cv-07362**

Dear Judge Carter:

Pursuant to the Court's order of June 27, 2025 (ECF No. 82), Plaintiff Securities and Exchange Commission (the "SEC") and (a) Defendants Stephen E. Apolant and Sky-Direct LLC, Relief Defendants NY Farms Group, Inc. and Equity Markets LLC ADV (the "Apolant Defendants"); (b) Defendants Charles Dilluvio and Seacor Capital, Inc. (the "Dilluvio Defendants"); and (c) Defendant Harry Zhabilov (together with the Apolant and Dilluvio Defendants, "Moving Defendants") respectfully submit this status report and proposed briefing schedule for the Court's consideration.

**1. Consolidation of Motions to Dismiss**

Moving Defendants have conferred and respectfully seek leave to file (a) a joint motion to dismiss on behalf of the Apolant and Dilluvio Defendants, and (b) a separate motion on behalf of Mr. Zhabilov. Moving Defendants respectfully submit that a single consolidated motion would be impracticable due to differences in allegations and claims against them and the legal arguments raised in their pre-motion letters.

**2. Proposed Briefing Schedule**

The SEC and Moving Defendants have conferred and propose the following briefing schedule on the motions to dismiss:

Moving briefs to be filed:	August 11, 2025
Opposition brief(s) to be filed:	September 9, 2025
Reply briefs to be filed:	September 23, 2025

**3. Appearance of Defendants Billy V. Ray, Jr. and Camelot Nevada Trust**

Defendants Ray and Camelot Nevada Trust have informed the undersigned counsel that they prefer to communicate directly with the Court regarding their intent to appear in the case.

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We thank the Court for its attention to this matter.

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Respectfully submitted,

SECURITIES AND EXCHANGE  
COMMISSION

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